

**RECEIVED**

JUL - 1 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

RICHARD W. NAGEL, CLERK OF COURT  
COLUMBUS, OHIO

Paul Vanhorn

(ENTER ABOVE THE NAME OF THE PLAINTIFF IN THIS ACTION)

IF THE PLAINTIFF IS A PRISONER: PRISONER # 56731

vs.

Alex Lape, Sheriff of Fairfield County, Ohio

(ENTER ABOVE THE NAME OF THE DEFENDANT IN THIS ACTION)

IF THERE ARE ADDITIONAL DEFENDANTS PLEASE LIST THEM:

**JUDGE WATSON**

**MAGISTRATE JUDGE LITKOVITZ**

**COMPLAINT**

I. PARTIES TO THE ACTION:

PLAINTIFF: PLACE YOUR NAME AND ADDRESS ON THE LINES BELOW. THE ADDRESS YOU GIVE MUST BE THE ADDRESS THAT THE COURT MAY CONTACT YOU AND MAIL DOCUMENTS TO YOU. A TELEPHONE NUMBER IS REQUIRED.

Paul Vanhorn

NAME - FULL NAME PLEASE - PRINT

345 Lincoln Ave

ADDRESS: STREET, CITY, STATE AND ZIP CODE

Lancaster Ohio 43130

740-656-5044

TELEPHONE NUMBER

IF THERE ARE ADDITIONAL PLAINTIFFS IN THIS SUIT, A SEPARATE PIECE OF PAPER SHOULD BE ATTACHED IMMEDIATELY BEHIND THIS PAGE WITH THEIR FULL NAMES, ADDRESSES AND TELEPHONE NUMBERS. IF NO ADDITIONAL PLAINTIFFS EXIST CONTINUE WITH THIS FORM.

PAGE 2 AND 3 OF THIS FORM DEAL ONLY WITH A PLAINTIFF THAT IS INCARCERATED AT THE TIME OF FILING THIS COMPLAINT.

Christopher Cook  
345 Lincoln Ave  
Lancaster, Oh 43130  
740-746-8763

Jerry Knott  
345 Lincoln Ave.  
Lancaster, Oh 43130  
740-415-4420

Anis Bared  
345 Lincoln Ave.  
Lancaster Oh 43130  
614-805-0041

Benjamin Severance  
345 Lincoln Ave  
Lancaster Oh 43130

IF YOU ARE A PRISONER FILING A CIVIL SUIT THE FOLLOWING INFORMATION IS REQUIRED:

PREVIOUS LAWSUITS:

- A. HAVE YOU BEGUN OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS ACTION OR OTHERWISE RELATING TO YOUR IMPRISONMENT? YES ( ) NO ( )
- B. IF YOUR ANSWER TO A IS YES, DESCRIBE THE LAWSUIT IN THE SPACE BELOW. (IF THERE IS MORE THAN ONE LAWSUIT, DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THE SAME OUTLINE.)
  1. PARTIES TO THIS PREVIOUS LAWSUIT

PLAINTIFFS:

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DEFENDANTS:

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2. COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY)

Southern District of Ohio

3. DOCKET NUMBER

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4. NAME OF THE JUDGE TO WHOM THE CASE WAS ASSIGNED

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5. DISPOSITION (FOR EXAMPLE, WAS THE CASE DISMISSED? WAS IT APPEALED? IS IT STILL PENDING?)

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6. APPROXIMATE DATE OF THE FILING OF THE LAWSUIT

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7. APPROXIMATE DATE OF THE DISPOSITION

PLACE OF PRESENT CONFINEMENT

Fairfield County Jail

A. IS THERE A PRISONER GRIEVANCE PROCEDURE IN THIS INSTITUTION?  
YES  NO

B. DID YOU PRESENT THE FACTS RELATING TO YOUR COMPLAINT IN THIS STATE PRISONER GRIEVANCE PROCEDURE? YES  NO

C. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

Will provide at a later date.

2. WHAT WAS THE RESULT?

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D. IF YOUR ANSWER IS NO, EXPLAIN WHY NOT.

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E. IF THERE IS NO PRISON GRIEVANCE PROCEDURE IN THIS INSTITUTION, DID YOU COMPLAIN TO PRISON AUTHORITIES? YES  NO

F. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

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2. WHAT WAS THE RESULT?

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DEFENDANTS:

PLACE THE NAME AND ADDRESS OF EACH DEFENDANT YOU LISTED IN THE CAPTION ON THE FIRST PAGE OF THIS COMPLAINT. THIS FORM IS INVALID UNLESS EACH DEFENDANT APPEARS WITH FULL ADDRESS FOR PROPER SERVICE.

1. Alex Lape Sheriff of Fairfield County Ohio  
NAMES - FULL NAME PLEASE

345 Lincoln Ave Lancaster Oh 43130  
ADDRESS - STREET, CITY, STATE AND ZIP CODE

2. \_\_\_\_\_

\_\_\_\_\_

3. \_\_\_\_\_

\_\_\_\_\_

4. \_\_\_\_\_

\_\_\_\_\_

5. \_\_\_\_\_

\_\_\_\_\_

6. \_\_\_\_\_

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IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE CONTINUE LISTING THEM.

PLEASE WRITE AS BRIEFLY AS POSSIBLE THE FACTS OF YOUR CASE. DESCRIBE HOW EACH DEFENDANT IS INVOLVED. INCLUDE THE NAME OF ALL PERSONS INVOLVED. GIVE DATES AND PLACES.

DO NOT GIVE ANY LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES.

IF YOU HAVE A NUMBER OF DIFFERENT CLAIMS; PLEASE NUMBER AND SET FORTH EACH CLAIM IN A SEPARATE PARAGRAPH. USE AS MUCH SPACE AS YOU NEED. YOU ARE NOT LIMITED TO THE PAPERS WE GIVE YOU. ATTACH EXTRA SHEETS THAT DEAL WITH YOUR STATEMENT CLAIM IMMEDIATELY BEHIND THIS PIECE OF PAPER.

United States fifth and fourteenth amends pretrial detainees  
Violations of Due process of law.

(1) Pretrial Detainees unsafe and unsanitary cell conditions

All detainees in said lawsuit have slipped and Injured themselves  
from slick floors, life threatening conditions, Constant fruit flies  
in bathroom and in our food, feces in the urinal, urinals not working,  
no soap for dishes, worms, lice, bedbugs, ants, Cold showers  
scalding showers,

(2) Inadequate healthcare, deprived of medications, overcharging for  
medications, no doctors available available, C/O's handing out medications.

(3) Inadequate food, small portions, low calorie count, unbalanced  
diet, no fruits, Constant consumption of expired food

(4) limited recreation, limited to 1 hour week at most

(5) placed in solitary confinement per entry into jail  
before court, without the proper hearings

(6) restricted communications, intentionally delaying  
correspondence, no visitation

(7) Last but most important stopping pretrial detainees  
and inmates from properly practicing and praising, as  
well as how to pray and when by all individuals involved.

IN THIS SECTION PLEASE STATE (WRITE) BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT, CITE NO CASES OR STATUTES.

We ask the courts for immediate injunction on unsafe cell conditions and demand that our health and wellness be brought up to appropriate standards deemed responsible, we also ask a monetary value of \$1,250,000.00 each for being held in unsafe conditions with the lack of a proper diet and health care. Furthermore the most important we feel is correct how they treat religion, by not putting stipulations on how and when, we pray as well as being completely transparent about foods and diets can not lead inmates to believe that it is something it is not.

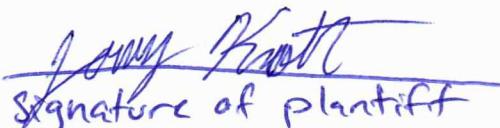
SIGNED THIS 25 DAY OF June 2024.

  
SIGNATURE OF PLAINTIFF  
Paul Vanhorn

  
Signature of Plaintiff  
Chris Cook

  
Signature of Plaintiff  
Anis Barad

  
Signature of Plaintiff  
Benjamin Severance

  
Signature of Plaintiff  
Jerry Knott